
EXHIBIT B

From: [Max Ciccarelli](#)
To: [Michael Shore](#); [Cohen, Justin S \(DAL - X61211\)](#)
Cc: [Team-Purdue-ST](#); [STPurdueHKService](#)
Subject: RE: C.A. No. 6:21-cv-00727-ADA; The Trustees of Purdue University v. STMicroelectronics N.V., et. al. -
Discovery responses and doc production
Date: Tuesday, September 20, 2022 4:05:03 PM

CAUTION: External Email!

Michael,

I don't think the statements in your email are accurate, but let's focus on what you say is missing.

Datasheets: As I mentioned on our call yesterday, we have already located some of the datasheets, and are working on a handful more that we expect to get this week. We anticipate having all the datasheets by the end of this week or early next week. If you identify any missing ones after that production, please let us know. As we also discussed yesterday, the datasheets don't really do anything in terms of understanding the structures in the accused products, but we don't need to get into that debate because you will have them in any event.

"New" die: Your email says that we disclosed a "new" die. Which die are you referring to? It is hard for me to address your concern without knowing what you are referring to.

Correlations: The only correlations left to give you are for the dice used in the modules. We will be sending you the remaining correlations this week.

Technical documents: The only remaining dice for which we need to provide you technical documents are two dice that are used in modules (but not used in the discrete products). We will be providing the technical documents for these two dice this week. The other dice used in the modules are dice that are also used in the discrete products, so you already have had that technical information for some time. The good news here is that at least we agree that you have the needed technical documents for the dice for which we provided you correlations between die and documents—I'll take a victory wherever I can find one.

With respect to conferring on the discovery responses, I have not had a chance to coordinate with the team yet, but know they are traveling tomorrow and have depositions on Thursday. Let me see what their availability is since they were involved in some of those responses. If they are not available tomorrow, I can talk to you about some of the issues and maybe we can advance some of them even if the rest of the team is not available.

Max Ciccarelli

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From: Michael Shore <mshore@shorefirm.com>

Sent: Tuesday, September 20, 2022 1:45 PM

To: Max Ciccarelli <max@CiccarelliLawFirm.com>; Cohen, Justin S (DAL - X61211)
<Justin.Cohen@hklaw.com>

Cc: Team-Purdue-ST <Team-Purdue-ST@shorefirm.com>

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et. al. - Discovery responses and doc production

ST Counsel,

The attached indicates the technical material still not produced despite repeated assurances the productions would be completed months ago. Worse, a brand new die has been disclosed for the first time. We need to reach finality on the production and disclosure of core technical documents. Be ready to discuss this tomorrow in our discovery conference on the latest ST discovery responses where nothing was produced. If ST is refusing to conference tomorrow, we will send a dispute chart noting ST's refusal to conference.

Michael